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UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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In re:		
SALVATORE J. CATALANO, 2ND, and	:	Chapter 13 Bankruptcy
SUSAN E. CATALANO,	:	**Case No. 5:14-bk-04282-RNO**
Debtors,	:	
vs.		
CHARLES DEHART, III,	:	**Objection to Motion to Sell**
Standing Chapter 13 Trustee,	:	
Respondent,	:	
and **All Interested Parties**	:	

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**OBJECTION TO DEBTOR'S MOTION TO SELL REAL PROPERTY LOCATED
AT 37 NORTH GREEN STREET, EAST STROUDSBURG, PENNYSLVANIA 18301**

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AND NOW COMES, the **MONROE COUNTY TAX CLAIM BUREAU** by and through its

Attorneys, NEWMAN, WILLIAMS, MISHKIN, CORVELEYN, WOLFE & FARERI, with **Objection to**

Debtor's Motion to Sell Real Property Located at 37 North Green Street, East

Stroudsburg, Pennsylvania, 18301, and in support thereof avers:

1.   The property proposed to be sold by the Debtor (the "Subject Property") is situate

in Monroe County, Pennsylvania.

2.   The **MONROE COUNTY TAX CLAIM BUREAU** has the legal authority and

responsibility to collect outstanding and/or overdue real property taxes for properties situate in

Monroe County, Pennsylvania.

3.   There are substantial real property taxes owed by and against the Subject Property

(the "Taxes").

4.   The Taxes are a lien against the Subject Property.

5.   The Motion of the Debtor does not provide for the full payment of the Taxes.

6.   Through April 30, 2019 outstanding taxes against the Subject Property amounted

to $1,626.61. Additional interest shall accrue after April 30, 2019, and additional taxes shall

become due on July 1, 2019.

WHEREFORE, The **MONROE COUNTY TAX CLAIM BUREAU** prays this Honorable Court for an Order that denying the Debtor's Motion to Sell Free and Clear of All Liens, unless and until Debtor proposes full payment of all real property taxes owed against the Subject Property from the sale proceeds.

NEWMAN, WILLIAMS, MISHKIN, CORVELEYN, WOLFE & FARERI, P.C.

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